

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
STATESVILLE DIVISION  
MDL DOCKET NO. 5:20-MD-2947-KDB-DSC**

**IN RE: LOWE’S COMPANIES, INC.  
FAIR LABOR STANDARDS ACT  
(FLSA) AND WAGE AND HOUR  
LITIGATION**

**THIS DOCUMENT APPLIES TO:**  
*All Cases*

**PLAINTIFFS’ UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE  
SETTLEMENT APPROVAL PAPERS**

On February 3, 2022, the Court granted Plaintiffs request for additional time to file documents relating to a proposed settlement [ECF No. 80], at this time Plaintiffs respectfully request that the deadline to file settlement approval papers be extended through and including May 20, 2022 for the following reasons :

1. Counsel for the Parties resolved this matter on December 31, 2021 by way of execution of a short-form term sheet.
2. Since that date, Counsel for the Parties have diligently negotiated the terms of a comprehensive settlement agreement that is necessary to fully and accurately memorialize the terms of the Parties’ Settlement, including the allocation of funds across Opt-in Plaintiffs holding varying job titles and job duties.
3. On March 24, 2022 the Parties fully executed the settlement agreement, including a model Named Plaintiff release that must be executed by each of the twenty-three Named Plaintiffs.
4. Plaintiffs’ Counsel is now in the process of collecting signatures from the Named Plaintiffs on each of their individual releases.

5. As part of their individual releases, thirteen of the twenty-three Named Plaintiffs are provided twenty-one day signing periods and a seven day revocation period as mandated by the Age Discrimination in Employment Act (“ADEA”).
6. Execution of the individual releases by the Named Plaintiffs, and expiration of the ADEA signing and revocation periods, must be accomplished prior to Plaintiffs’ Counsel filing their Motion for Approval of Settlement.
7. As such, and to accommodate for anticipated delays in collection all of the necessary Named Plaintiff signatures, Plaintiffs’ Counsel requests until May 20, 2022 to file the Motion for Approval of Settlement.
8. Defendants do not object to this extension request.
9. A draft order is attached hereto for the Court’s consideration.

Dated: March 25, 2022

Respectfully submitted,

/s/ Kevin J. Stoops

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 25, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to all counsel of record.

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<b>FAIR LABOR STANDARDS ACT</b>	)	
<b>(FLSA) AND WAGE AND HOUR</b>	)	
<b>LITIGATION</b>	)	<b>[PROPOSED] ORDER</b>
	)	
	)	
<b>THIS DOCUMENT APPLIES TO</b>	)	
<i>All Cases</i>	)	
_____	)	

**[PROPOSED] ORDER**

The Court has reviewed Plaintiffs’ request for additional time to file documents relating to a proposed settlement. *See* Doc No. 87.

For good cause shown, it is HEREBY ORDERED that the Parties shall file appropriate settlement approval papers by May 20, 2022.

SO ORDERED, ADJUDGED AND DECREED.

Signed: March \_\_\_\_\_, 2022

\_\_\_\_\_  
Kenneth D. Bell  
United States District Judge